



**U.S. Department of Housing and Urban Development**  
Community Planning and Development Division  
Region IV, Miami Field Office  
Brickell Plaza Federal Building  
909 SE First Avenue, Room 500  
Miami, FL 33131-3042

May 8, 2014

Ms. Sheila N. Rose  
Director of Sustainable Development  
City of Coconut Creek  
4800 West Copans Road  
Coconut Creek, FL 33063

**SUBJECT:** Scheduled On-site Monitoring Visit – FY 2014  
Community Development Block Grant (CDBG) Program  
B-11-MC-12-0054 through B-13-MC-12-0054

Dear Ms. Rose:

During the week of March 10, 2014, La Vora Bussey, Community Planning and Development Representative conducted an on-site performance evaluation of the City of Coconut Creek Community Development Block Grant (CDBG) Program.

The purpose of this review was to determine program compliance with applicable laws and regulations, and to look at your community's continuing capacity to carry out the programs in a timely manner. It also provided an opportunity to discuss any issues/problems the City had in administering its CDBG programs. At the exit conference held on March 24, 2014, the results of our review were discussed and the City was provided the opportunity to comment on our initial conclusions.

The enclosed report contains detailed information regarding the purpose, requirements, and conclusions reached on each of the compliance areas reviewed. The areas selected for the CDBG program review were Management (Overall Management and Environmental), Services (Beneficiaries and Rehabilitation Activities) and Physical (Lead Based Paint). Our conclusions are based on information gathered from your agency records, HUD administrative files, and through interviews with program staff.

The enclosure summarizes the conclusions of this review. The monitoring resulted in no findings and no concerns. It should be noted that our monitoring consists of only a sampling of activities and therefore, does not relieve the City of its responsibility for adequate internal controls of the programs to ensure program compliance.

We would like to compliment the City's staff for the cooperation and assistance provided during the monitoring process. If you have any questions related to the review, you may contact La Vora Bussey, Community Planning and Development Representative, at (305) 520-5007 or via email at [LaVora.B.Bussey@hud.gov](mailto:LaVora.B.Bussey@hud.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Ann D. Chavis', with a long horizontal flourish extending to the right.

Ann D. Chavis

Director

Community Planning and Development Division

Enclosure

cc: Scott Stoudenmire, Deputy Director of Development Services  
Marianne Bowers, Housing and Grant Specialist, Sustainable Development  
Shekeria Brown, Community Redevelopment Associates of Florida  
Lisa Bustamante, Program Manager, US HUD

Community Development Block Grant (CDBG)  
Monitoring Report  
City of Coconut Creek, Florida

Purpose of Evaluation

The purpose of this review was to conduct an assessment of the City's progress according to the stated goals and objectives of the approved Consolidated Plan and Action Plans as well as compliance with the applicable Federal regulations. The monitoring included a review of the City's records related to the program, on-site visits of selected beneficiaries, and a discussion with members of your staff at the end to examine our preliminary conclusions of the review.

HUD Staff Conducting the Review

La Vora Bussey, CPD Representative  
Lisa Bustamante, Program Manager (Exit Conference)

Persons Interviewed During the Review

Shekeria Brown, Community Redevelopment Associates (CRA) of Florida

Areas Reviewed

CDBG Program:  
Management (Overall Management and Environmental)  
Services (Beneficiaries and Housing Rehabilitation Activities)  
Physical (Lead Based Paint)

**AREA ASSESSMENTS AND CONCLUSIONS DRAWN**  
**Community Development Block Grant**

**Program Summary**

The City of Coconut Creek manages and annually received Community Development Block Grant funds to primarily address the needs of low-and moderate income residents. The City has submitted its Annual Action plan and Consolidated Annual Performance and Evaluation Report (CAPER) within program guidelines. Additionally, the City has been timely in its expenditures of funds as required by program guidelines.

The City of Coconut Creek is a CDBG "exception grantee". The percentage represents the minimum percentage of low- and moderate-income persons that must reside in the service area of an area benefit for the activity to be assisted with CDBG funds. As of the date of this review, the exception percentage for Coconut Creek is 43.9%.

## **Management (Overall Management)**

The purpose of the review was to determine if the City's system and/or procedures for its CDBG program are used in accordance with program requirements as stated in 24 CFR 570.501(b) and 24 CFR Subpart K.

We reviewed eleven (11) beneficiaries' files under the City's Minor Home Repair program and twenty-three (23) beneficiaries' files for its Purchase Assistance Program. Our review of the files disclosed that they contained the criteria for program acceptance and the designated targeted population served.

The City indicated its written policies and procedures were used to determine eligibility of CDBG activities through the guidance of program requirements in accordance with HUD regulations. Our review revealed no concerns.

## **Services**

The City classifies its housing program under 24 CFR 570.202. The two activities funded with CDBG funds are Minor Home Repair and Purchase Assistance to assist qualified low- and-moderate income households. The Minor Home Repair program provides assistance to qualified income homeowners that need repairs to their house. The Purchase Assistance program provides downpayment subsidy to qualified income applicants to purchase a house. An eight (8) hour counseling course has to be completed successfully by the applicant as a requirement for the Purchase Assistance program. The housing units must meet the environmental and lead hazard standards requirements by HUD.

## **Beneficiaries**

During the monitoring, the beneficiaries' files were reviewed to ensure that there was adequate documentation to show evidence of income qualifications under the City's Purchase Assistance and Minor Home Repair programs, and the applicants' income does not exceed 80% AMI to meet eligibility to participate in the City's programs. Our review revealed that the City uses current income limits posted by HUD to determine if the applicants' can qualify up to 80% AMI. The City requests and verifies documentation to confirm applicants' income with a third party entity, request copies of pay stubs, bank statements, social security information and other pertinent financial information. Based on the review, there were no findings or concerns noted.

## **Environmental Standards**

For the purposes of section 104(g) of the Act, the regulation in 24 CFR part 58 specify the other provisions of law which further the purposes of the National Environmental Policy Act of 1969, and the procedures by which grantees must fulfill their environmental responsibilities. In certain cases, grantee assume these environmental review, decision-making, and action responsibilities by execution of grant agreements with the Secretary as stated in the CDBG regulations under 24 CFR 570.604.

Under the City's Minor Home Repair program and Purchase Assistance program, there were a total of thirty-four (34) files reviewed to ensure that the City was following the environmental requirements. In the City's policies and procedures, all properties are required to have thorough environmental reviews as part of its planning process. Each file contained a checklist.

Overall, the City provided adequate documentation to illustrate that environmental reviews were completed. A letter from our office with an executed copy of form 7015.15, (Request for Release of Funds (RROF)), was kept in the file. There were no findings or concerns noted.

### **Lead- Based Paint (Physical)**

In April 22, 2008, Environmental Protection Agency (EPA) issued a rule requiring the use of lead-safe practices and other actions aimed at preventing lead poisoning. Under the rule, beginning in April 2010, contractors performing renovation, repair and painting projects that disturb lead-based paint in homes, child care facilities, and schools built before 1978 must be certified and must follow specific work practices to prevent lead contamination. The City also ensured that the properties that were built pre-1978 were abated for Lead-Based Paint. Under the Minor Home Repair program and Purchase Assistance program, a total of thirty-four (34) files were reviewed to ensure that the City followed the EPA rule under Lead Hazard.

The monitoring review revealed that the City is following the requirements as mandated by the Lead Based Paint rules as per 24 CFR parts 35 and no concerns were noted.